

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION  
-----X

SUSANA RODRIGUEZ AND JOSE RODRIGUEZ,

07CV05315

Plaintiffs,

ANSWER TO  
AMENDED  
COMPLAINT

- against -

150 BROADWAY CORP., 150 BROADWAY  
N.Y. ASSOCS. L. P., 55 WATER STREET  
CONDOMINIUM, 90 CHURCH STREET  
LIMITED PARTNERSHIP, ALAN KASMAN  
DBA KASCO, AMBIENT GROUP, NC., ANN  
TAYLOR STORES CORPORATION, AT&T  
WIRELESS SERVICES, NC., BAILEY N.Y.  
ASSOCIATES, BANKERS TRUST COMPANY,  
BATTERY PARK CITY AUTHORITY, BELFOR  
USA GROUP, INC., BFP ONE LIBERTY PLAZA  
CO., LLC., BLACKMON-MOORING STEAMATIC  
CATASTROPHE, INC D/B/A BMS CAT,  
BOSTON PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., BT PRIVATE  
CLIENTS CORP., DEUTSCHE BANK TRUST  
COMPANY, DEUTSCHE BANK TRUST  
COMPANY AMERICAS, DEUTSCHE BANK  
TRUST CORPORATION, ENVIROTECH CLEAN  
AIR, INC., GENERAL RE SERVICES CORP.,  
GPS ENVIRONMENTAL CONSULTANTS, INC.,  
HILLMAN ENVIRONMENTAL GROUP, LLC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY,  
INC., KASCO RESTORATION SERVICES CO.,  
MERRILL LYNCH & CO, INC., NATIONAL  
ASSOCIATION OF SECURITIES DEALERS,

INC., NEW LIBERTY PLAZA LP, NEW WATER STREET CORP., NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL INC., ONE LIBERTY PLAZA, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, NC., THE BANK OF NEW YORK TRUST COMPANY, NA THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TOSCORP INC., TUCKER ANTHONY, INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC, WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

-----X

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York  
April 1, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT  
Attorneys for Defendant –Envirotech  
3000 Marcus Avenue, Suite 2E1  
Lake Success, New York 11042  
(516) 775-5800

BY:   
Heather L. Smar (4622)